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## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT

MYWEBGROCER, INC.,

Plaintiff and

Counterclaim Defendant,

v.

ADLIFE MARKETING & COMMUNICATIONS CO., INC.,

Defendant and

Counterclaim Plaintiff.

Civil Action No. 5:16-CV-00310-GWE

MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

## ASSENTED-TO MOTION FOR LEAVE TO FILE CONFIDENTIAL MATERIAL UNDER SEAL

Pursuant to Local Rules 5.2 and 7, Defendant and Counterclaim Plaintiff Adlife Marketing and Communications Co, Inc. ("Adlife"), by and through its undersigned attorneys, hereby moves for leave to file the following documents in unredacted form under seal:

- Adlife's Motion for Summary Judgment
- Adlife's Statement of Undisputed Facts; and
- Complete versions of Exhibit 20 Excerpts from the 30(b)(6) Deposition of MyWebGrocer, Inc. Jeremiah "Jerry" Tarrant as testifying witness

The excerpts from the 30(b)(6) Deposition of MyWebGrocer, Inc. listed above contains material that has been designated "Confidential" pursuant to the Confidentiality Stipulation and Protective Order (ECF 40) entered in this case. The Confidential material contained in that document are further referenced or quoted in Adlife's Motion for Summary Judgment and Statement of Undisputed Facts.

Pursuant to Local Rule 7(a)(7), the undersigned certifies that Adlife made a good faith attempt to obtain Defendant's assent to the relief requested herein, and that MyWebGrocer's counsel has provided the requested assent.

WHEREFORE, Adlife respectfully requests that this Court GRANT its Motion to File the foregoing documents in unredacted form under seal and in redacted form on ECF.

Dated: March 1, 2019 Respectfully submitted,

/s/ Mathew K. Higbee
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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronically filing with the Clerk of the Court using CM/ECF on this **1st** day of **March 2019**, on all counsel or parties of record on the service list below.

/s/ Gregory P. Howard
Gregory P. Howard

## **SERVICE LIST**

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